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September 20, 2021

Eugenia Naranjo  
Remedial Project Manager  
U.S. Environmental Protection Agency, Region II  
Emergency and Remedial Response Division  
290 Broadway, 19<sup>th</sup> Floor  
New York, NY 10007-1866

**Re: Monthly Progress Report No. 211, Newark Bay Study Area**

Dear Ms. Naranjo:

GSH is submitting two (2) copies of Monthly Progress Report No. 211 for work performed during August 2021 at the Newark Bay Study Area. This progress report has been prepared pursuant to Section X, Paragraph 71 of the Administrative Order on Consent between the U.S. Environmental Protection Agency and Occidental Chemical Corporation, Index No. CERCLA 02-2004-2010.

If you have any questions, please contact me.

Sincerely,

Carlie Thompson  
Project Manager  
Glenn Springs Holdings, Inc.

Enclosures (2 copies)

cc: Enrique Castro, Glenn Springs Holdings, Inc.  
Juan Somoano, Glenn Springs Holdings, Inc.

Bureau of Case Management  
New Jersey Department of Environmental Protection  
Site Remediation Program 401-05F  
P.O. Box 420  
Trenton, NJ 08625-0420  
Attn: Jay Nickerson/Anthony Cinque, Newark Bay Project Manager

Chief, New Jersey Superfund Branch  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
290 Broadway, 17th Floor  
New York, NY 10007-1866  
Attn: Amelia Wagner, Diamond Alkali Site Attorney – Newark Bay Study Area

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NEWARK BAY STUDY AREA  
WORK PERIOD: August 2021**

**Summary of Activities During Reporting Period**

- Various activities were performed during the reporting period to achieve compliance with the Order as summarized below. The monthly coordination call was held on August 10.

*Remedial Investigation Report (RIR):*

GSH continued revisions based on EPA's back check comments.

*Feasibility Study (FS) Interim Deliverable – Remedial Action Objective/Preliminary Remedial Goal (RAO/PRG) Technical Memorandum:*

Discussions continued regarding the calculation/selection process for PRGs. A background data summary was sent on August 9 that included a summary of the Small Volume Chemical Water Column Monitoring data in the Kill van Kull. Comments were received on August 30.

*FS Interim Deliverable – Remedial Alternatives Screening (RAS) Technical Memorandum:*

The model recalibration run finished and calibration trajectories were shared on the August 25 progress call. The baseline no action forecast run continued and is expected to finish in September.

- Submitted deliverables for the reporting period included:
- August 19 – Monthly Progress Report No. 210 for July 2021
  - August 24 – Draft project schedule for discussion
- Completion of the work required by the order is estimated as follows:

	<b>Estimated Date of Completion</b>	<b>Estimated Percentage Complete</b>
<b>RI</b>	December 2021	90%
<b>FS</b>	May 2023	35%

There were no violations of the Order or other problems encountered that required corrective action.

**Planned Activities During the Next Two Months**

*RIR:*

GSH will continue with revisions. It was agreed the next version should include any agreed-upon model revisions so a submittal date is targeted for October 2021 based on the expected

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receipt of model results at the beginning of September.

*FS Interim Deliverable – RAO/PRG Technical Memorandum:*

Discussions will continue regarding the selection approach for PRGs to be documented in a revised RAO/PRG memo. A submittal date for the revised memo will be set once the selection process has been finalized. The calibration of the bioaccumulation model will be rechecked after recalibration of the HST/CFT model. The bioaccumulation model will also be rerun with the revised baseline no action forecast results.

Discussions on the relation of background and reference area values to PRGs will continue with a call in September. Comments on the background data summary will be incorporated into the revised RAO/PRG memo. Subsequent calls will likely be needed to resolve how background values will be incorporated into the PRG development.

*FS Interim Deliverable – RAS Technical Memorandum:*

The baseline no action forecast model run results will be reviewed along with the model documentation. The USACE Harbor Deepening and Channel Improvements project will be incorporated into the model. The next call will be held on September 15 to discuss the results and how the USACE project will be incorporated.

GSH will include the Identification of Candidate Technologies (ICT) memo content into the RAS Technical Memorandum.